

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC PHARMACEUTICALS  
PRICING ANTITRUST LITIGATION

MDL 2724  
Case No. 16-MD-2724-CMR

THIS DOCUMENT RELATES TO:  
  
*ALL ACTIONS*

HON. CYNTHIA M. RUFE

**DECLARATION OF MARGARET A. ROGERS**

Margaret A. Rogers declares the following pursuant to 28 U.S.C. § 1746:

1. I am a partner at the law firm Arnold & Porter Kaye Scholer LLP and a member in good standing of the Bar of the State of New York. I submit this declaration in support of Sandoz Inc.'s ("Sandoz") objection to the Special ESI Master's Amended Report and Recommendation Relating to Global Search Term Modifications Requested by Sandoz (ECF No. 1416), which recommended that Sandoz apply the broadest search terms negotiated for certain custodians to its former Chief Executive Officers' ("CEOs"), and rejected Sandoz' request for a protective order requiring focused search terms.

**THE TIER 1 TERMS ARE DISPROPORTIONATE AS APPLIED TO THE CEOS**

2. The Tier 1 terms are disproportionate in light of the substantial discovery Sandoz has provided from 34 other custodians, the substantial discovery Sandoz already agreed to provide from the CEOs (approximately 165,800 documents<sup>1</sup>), the absence of any factual allegations that Sandoz' CEOs were involved in or knew about alleged anticompetitive conduct, the breadth of the

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<sup>1</sup> Note, these documents contain the search terms Sandoz proposed to apply to the former CEO files. They are not necessarily all relevant and responsive to this litigation and are subject to clawback under this Court's PTO 105.

roles and responsibilities of the CEOs, and the overbreadth of the Tier 1 terms, which capture large swaths of irrelevant and competitively sensitive information.

3. Sandoz' search term proposal includes many of the terms already negotiated by the parties for other custodians, excluding only those that fail to appropriately target relevant information. The chart below compares Sandoz' proposal with the different categories of search terms negotiated by the parties for other custodians. With the exception of a handful of terms that differ slightly between the Tier 1 and Tier 2 Drug search terms, there is no dispute concerning the Drug Terms, Defendant Domain Terms and Trade Association / Industry Event Terms. Sandoz submits that all of those terms will do the heavy lifting in terms of targeting and locating potentially responsive information in this case.

<b>Search Term Categories Used for Other Custodians</b>	<b>Sandoz' Proposal for the CEOs</b>
<b>1. Drugs Terms</b>	Agreed Tier 2 terms (which relate to every product at issue in the MDL)
<b>2. Defendant Domain Names</b>	Agreed terms (these are the same for Tier 1 and Tier 2)
<b>3. Trade Association / Industry Event</b>	Agreed terms (these are the same for Tier 1 and Tier 2)
<b>4. Defendant Names as Standalone Terms</b>	Defendant Names with limiters
<b>5. General Business Words as Standalone Terms</b>	Targeted General Standalone Terms targeting Plaintiffs' core alleged conspiracy allegations
<b>6. Plaintiff Names as Standalone Terms</b>	None
<b>7. &gt;600 People Names</b>	None

4. Sandoz also offered to search for the names of the other defendant manufacturers in proximity to reasonable limiting terms. For example, Sandoz offered to search for

[manufacturer name] within three words of terms like “call me” to locate internal documents, if any, indicating that a conversation took place with an individual at a competitor company. Sandoz proposed limiting terms like “don’t follow,” “irrational,” or “irresponsible” to locate internal documents, if any, reflecting general comments about Sandoz’ competitors or conduct with respect to the competitor generally as opposed to conduct concerning the specific products at issue in the case (which would already be captured by running the drug terms). Sandoz also proposed socially-oriented limiting terms like “golf,” “beer\*,” and “buddy” to target information reflecting social relationships and meetings. Sandoz did not agree to run the defendant manufacturer names as standalone terms (i.e., without limiters) because that would sweep in every document that mentions another competitor regardless of the actual content of the document. A list of the disputed search terms is attached hereto as **Exhibit 1**.

5. Sandoz also proposed a targeted set of standalone terms designed to capture information, if any, about Plaintiffs’ core allegations concerning an alleged “fair share” conspiracy (e.g. “fair share”, rules /4 road, sandbox). *Id.* Sandoz excluded some general standalone business terms (e.g., “horse trad\*”, follow\* w/3 leader, and pric\* w/3 reasonable etc.) because they target ordinary business correspondence and overwhelmingly fail to capture relevant information. *Id.*

6. To quantify the overbreadth of the disputed terms, Sandoz conducted a random statistical sample of the disputed terms. For purposes of this test, we excluded documents that also appear within the files of other Agreed Custodians and, thus, have been or will be produced regardless of this dispute.

7. Sandoz’ e-discovery vendor created a statistically significant random sample for each category of disputed search terms, sufficient to achieve a 99% confidence level with a +/- 5% margin of error. The purpose of the sampling was to test whether the terms proposed by plaintiffs

in each category target potentially relevant information. Thus, for each category, we sampled documents that contain only search terms for the category at issue. In other words, the sample comprising Plaintiffs' proposed names of Defendant Manufacturers as standalone terms contains documents that exclusively hit on a "Defendant Name" term and no other proposed search terms.

8. The results of the sampling confirm that the disputed terms do not provide a screen for relevance because overall approximately 76% of the sampled documents were non-responsive as shown in the table below.

CEO Unique Documents	Percent Non-Responsive
Named Plaintiff Terms	~77%
Defendant Name Terms	~76%
General Standalone Terms	~75%
People Terms	~76%
<b>Average</b>	<b>~76%</b>

#### **The Global Tier 1 Terms Impose An Undue Burden and Expense**

9. Compared with Sandoz' search term proposal, the Global Tier 1 Terms capture approximately 84,000 more CEO documents. Sandoz' e-discovery vendor estimates that reviewing these 84,000 documents for responsiveness (for clawback purposes) in a linear review (*i.e.*, document-by-document, as opposed to a technology assisted review) would cost between \$100,000 - \$130,000. However, the actual costs associated with review and production of these documents will be significantly higher, because this estimate excludes time spent preparing documents for review, vendor time quality checking the review before production, potential review of foreign language documents, potential privilege logging, and potential redactions. This also excludes time spent by Arnold & Porter attorneys to answer questions for the review team and perform any additional quality control review. Finally, this also excludes time spent by Arnold

& Porter attorneys to clawback irrelevant documents, and meet and confer with plaintiffs concerning those clawbacks requests.

10. Further, while the cost estimates for the labor associated with reviewing and producing these disputed 84,000 documents taken in isolation may appear small, the cumulative burden on Sandoz is significant. As of today, Sandoz has produced more documents than any party in this litigation, costing millions of dollars. That work continues, thus, the company will continue to incur significant expense going forward irrespective of the outcome of this dispute.

11. Finally, it is impossible to quantify with precision the cost to the company of the loss in competitive advantage that would be suffered by the inadvertent disclosure or misuse of any of its trade secrets and other highly confidential and proprietary business information. This case has already seen two sealed complaints leaked to the press. Even setting aside the risk of unlawful disclosure to the public, an equally threatening (and perhaps greater) risk would be the inadvertent disclosure of information to any one of the parties to this case, which includes nearly all of Sandoz competitors and its largest customers. The company must bear that risk for information that is relevant to the claims and defenses, but it is inappropriate and unduly burdensome to impose that burden for information that is irrelevant.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
June 26, 2020

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*/s/ Margaret A. Rogers*

Margaret A. Rogers

# **EXHIBIT 1**

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
Defendant Names	"G&W"	("G&W") w/3 General Standalone Limiter
Defendant Names	"Hi Tech"	("Hi Tech") w/3 General Standalone Limiter
Defendant Names	"HiTech"	("HiTech") w/3 General Standalone Limiter
Defendant Names	"Hi-Tech"	("Hi-Tech") w/3 General Standalone Limiter
Defendant Names	"West Ward"	("West Ward") w/3 General Standalone Limiter
Defendant Names	"WestWard"	("WestWard") w/3 General Standalone Limiter
Defendant Names	"West-Ward"	("West-Ward") w/3 General Standalone Limiter
Defendant Names	Acorn	(Acorn) w/3 General Standalone Limiter
Defendant Names	Actavis*	(Actavis*) w/3 General Standalone Limiter
Defendant Names	Akorn*	(Akorn*) w/3 General Standalone Limiter
Defendant Names	Amneal	(Amneal) w/3 General Standalone Limiter
Defendant Names	Apotex*	(Apotex*) w/3 General Standalone Limiter
Defendant Names	Ascend	(Ascend) w/3 General Standalone Limiter
Defendant Names	Auro* OR Bindo	(Auro* OR Bindo) w/3 General Standalone Limiter
Defendant Names	Barr	(Barr) w/3 General Standalone Limiter
Defendant Names	Breck*	(Breck*) w/3 General Standalone Limiter
Defendant Names	Camber*	(Camber*) w/3 General Standalone Limiter
Defendant Names	Citron	(Citron) w/3 General Standalone Limiter
Defendant Names	Dava	(Dava) w/3 General Standalone Limiter
Defendant Names	DRL	(DRL) w/3 General Standalone Limiter
Defendant Names	Emcure	(Emcure) w/3 General Standalone Limiter
Defendant Names	Epic NOT w/1 ("Epic Pharmacy" or "Epic Pharmacies")	(Epic NOT w/1 ("Epic Pharmacy" or "Epic Pharmacies")) w/3 General Standalone Limiter
Defendant Names	Epic NOT w/3 (fail OR win OR victory OR loss)	(Epic NOT w/3 (fail OR win OR victory OR loss)) w/3 General Standalone Limiter
Defendant Names	Glenmark	(Glenmark) w/3 General Standalone Limiter
Defendant Names	Greenstone	(Greenstone) w/3 General Standalone Limiter
Defendant Names	Heritage*	(Heritage*) w/3 General Standalone Limiter

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
Defendant Names	Impax*	(Impax*) w/3 General Standalone Limiter
Defendant Names	Lannett	(Lannett) w/3 General Standalone Limiter
Defendant Names	Lupin	(Lupin) w/3 General Standalone Limiter
Defendant Names	Mayne*	(Mayne*) w/3 General Standalone Limiter
Defendant Names	Morton w/2 Grove	(Morton w/2 Grove) w/3 General Standalone Limiter
Defendant Names	Mutual NOT w/1 ("Mutual Drug Wholesale" OR "Mutual Wholesale" OR "N. C. Mutual" OR "Mutual Drug" OR "mutualdrug.com" OR "NC Mutual" OR "Mutual customer")	(Mutual NOT w/1 ("Mutual Drug Wholesale" OR "Mutual Wholesale" OR "N. C. Mutual" OR "Mutual Drug" OR "mutualdrug.com" OR "NC Mutual" OR "Mutual customer")) w/3 General Standalone Limiter
Defendant Names	Mutual NOT w/3 (insurance OR love OR feel* OR respect OR fund* OR America OR exclusiv* OR journey OR omaha OR coven* OR agree* OR promise* OR terminat* OR written OR intent OR interest* OR decision OR license* OR nondisclosure OR "year term" OR "year-term"))	(Mutual NOT w/3 (insurance OR love OR feel* OR respect OR fund* OR America OR exclusiv* OR journey OR omaha OR coven* OR agree* OR promise* OR terminat* OR written OR intent OR interest* OR decision OR license* OR nondisclosure OR "year term" OR "year-term")) w/3 General Standalone Limiter
Defendant Names	Mylan*	(Mylan*) w/3 General Standalone Limiter
Defendant Names	Oceanside	(Oceanside) w/3 General Standalone Limiter
Defendant Names	Par	(Par) w/3 General Standalone Limiter
Defendant Names	Perrigo*	(Perrigo*) w/3 General Standalone Limiter
Defendant Names	Pliva	(Pliva) w/3 General Standalone Limiter
Defendant Names	Reddy*	(Reddy*) w/3 General Standalone Limiter
Defendant Names	Sun NOT w/1 (Sunday OR sunscreen OR sunblock OR "Baltimore Sun" OR "Prairie Sun" OR "Sun Sentinel" OR "Vancouver Sun")	(Sun NOT w/1 (Sunday OR sunscreen OR sunblock OR "Baltimore Sun" OR "Prairie Sun" OR "Sun Sentinel" OR "Vancouver Sun")) w/3 General Standalone Limiter



Term Category	Plaintiffs' Proposal	Sandoz's Proposal
Defendant Names	Sun NOT w/3 (date OR Jan* OR Feb* OR Mar* Or Apr* OR May OR June OR July OR Aug* OR Sept* OR Oct* OR Nov* OR Dec* OR "01/" OR "02/" OR "03/" OR "04/" OR "05/" OR "06/" OR "07/" OR "08/" OR "09/" OR "10/" OR "11/" OR "12/" OR Mon* OR Tue* OR Wed* OR Thu* OR Fri* OR Sat* OR skin OR screen OR SPF OR lotion OR ointment OR temperature OR store* OR direct or light)	(Sun NOT w/3 (date OR Jan* OR Feb* OR Mar* Or Apr* OR May OR June OR July OR Aug* OR Sept* OR Oct* OR Nov* OR Dec* OR "01/" OR "02/" OR "03/" OR "04/" OR "05/" OR "06/" OR "07/" OR "08/" OR "09/" OR "10/" OR "11/" OR "12/" OR Mon* OR Tue* OR Wed* OR Thu* OR Fri* OR Sat* OR skin OR screen OR SPF OR lotion OR ointment OR temperature OR store* OR direct or light)) w/3 General Standalone Limiter
Defendant Names	SUNPHARMA	(SUNPHARMA) w/3 General Standalone Limiter
Defendant Names	Taro	(Taro) w/3 General Standalone Limiter
Defendant Names	Teligent*	(Teligent*) w/3 General Standalone Limiter
Defendant Names	Teva	(Teva) w/3 General Standalone Limiter
Defendant Names	UDL	(UDL) w/3 General Standalone Limiter
Defendant Names	Upsher*	(Upsher*) w/3 General Standalone Limiter
Defendant Names	Valeant	(Valeant) w/3 General Standalone Limiter
Defendant Names	Versapharm OR Versap*	(Versapharm OR Versap*) w/3 General Standalone Limiter
Defendant Names	Wockh*	(Wockh*) w/3 General Standalone Limiter
Defendant Names	Zydus	(Zydus) w/3 General Standalone Limiter
Drug Names	desmo* NOT w/1 Desmond*	(desmop* w/2 acet*)
Drug Names	Disop*	(disopyr* w/2 phosp*) OR (disopyr* w/2 cap*)
Drug Names	Doxa*	(Doxaz* NOT w/1 Doxapram)
Drug Names	Enala*	(Enala* NOT w/1 Dihy*)
Drug Names	Oxybut*	Oxybuty*
Drug Names	Praz*	((prazos*) OR (praz* w/2 hydro*))
General Standalone Terms	"after this" w/2 ("no more" or done)	
General Standalone Terms		"discuss off-line"
General Standalone Terms	"fluff pric**"	
General Standalone Terms	"ghost call**"	
General Standalone Terms	"giv* up" w/5 (business OR share OR market OR drug)	
General Standalone Terms	"give up ms"	
General Standalone Terms	"horse trad**"	
General Standalone Terms	"M/S" W/10 (acquisition OR divestiture OR dynamics OR guidance OR merger)	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
General Standalone Terms	"M/S" W/10 (add* OR adjust* OR chang* OR declin* OR decreas* OR divid* OR drop OR expan* OR gain* OR heavy OR high* OR hik* OR hold* OR increas* OR lead* OR low* OR more OR new OR "pick up" OR rais* OR reduc* OR relinquish* OR retain OR secure OR shift* OR split* OR tak*)	
General Standalone Terms	"M/S" W/10 (allocat* OR agree OR aim* OR compet* OR compromis* OR even OR fair OR fix* OR forecast* OR game* OR gave OR giv* OR goal OR "let W/5 have" OR "like mind*" OR opportunit* OR position OR priorit* OR strateg* OR target*)	
General Standalone Terms	"M/S" W/10 (challeng* OR concern OR confirm* OR disrupt* OR disturb* OR follow* OR enough OR police OR policing OR pressur* OR project* OR saturat* OR "too much" OR trad* OR underdevelop* OR underrepresent* OR upset*)	
General Standalone Terms	"M/S" W/10 (chill OR irrational* OR irresponsible OR rational* OR reasonable OR responsible)	
General Standalone Terms	"M/S" W/10 (criminal OR illegal OR schem*)	
General Standalone Terms	"M/S" W/10 (desir* OR feedback OR hear* OR look* OR need* OR notif* OR piece* OR seek* OR want* OR yield*)	
General Standalone Terms	"Red Flag"	
General Standalone Terms	"sent the message"	
General Standalone Terms	"slow follower"	
General Standalone Terms	"slow to follow"	
General Standalone Terms	"slow to raise pric**"	
General Standalone Terms	"strong follower"	
General Standalone Terms	"strong leader"	
General Standalone Terms	"told me something"	
General Standalone Terms	"we will be done"	
General Standalone Terms	"will convey that we"	
General Standalone Terms	"women in the industry"	
General Standalone Terms	"word on the street" AND NOT (fiercepharma OR park* OR guggenheim OR valuation OR "broadfincapital" OR rating OR capital)	
General Standalone Terms	"zero sum" OR "zero-sum"	
General Standalone Terms	(antitrust OR ("anti trust")) w/3 (violate or break or illegal)	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
General Standalone Terms	(cede or conced*) w/5 (share OR market OR mkt OR pric* OR business OR customer* OR bid OR offer OR account*)	
General Standalone Terms	(meet* OR met OR have OR had) W/5 secret	
General Standalone Terms	anticompetitive OR (anti w/2 competitive)	
General Standalone Terms	bid w/3 "do not"	
General Standalone Terms	bid w/3 declin*	
General Standalone Terms	bid w/5 fak*	
General Standalone Terms	bid w/5 lowball*	
General Standalone Terms	Break w/2 rank	
General Standalone Terms	Bring* w/5 ("price up" OR "Money up" OR "\$ up" OR share)	
General Standalone Terms	cartel	
General Standalone Terms	collu*	
General Standalone Terms	colus*	
General Standalone Terms	communicat* W/10 illegal	
General Standalone Terms	compet* w/3 (don't OR avoid OR exclude)	
General Standalone Terms	competit* W/3 agree*	
General Standalone Terms	competit* W/5 irrational	competit* w/3 irrational
General Standalone Terms	competit* W/5 irresponsible	competit* w/3 irresponsible
General Standalone Terms	competit* W/5 rational	competit* w/3 rational
General Standalone Terms	competit* W/5 reasonable	competit* w/3 reasonable
General Standalone Terms	competit* W/5 responsible	competit* w/3 responsible
General Standalone Terms	complain w/10 (share* OR pric* OR market* OR compet* OR bid OR offer)	
General Standalone Terms	conspir*	
General Standalone Terms	cost* W/3 decreas*	
General Standalone Terms	cost* W/3 increas*	
General Standalone Terms	declin* W/5 match	
General Standalone Terms	dumb w/10 (share* OR pric* OR market* OR compet* OR bid OR offer OR account*)	
General Standalone Terms	expect W/3 increas*	
General Standalone Terms	fair W/10 police	
General Standalone Terms	fair W/10 policing	
General Standalone Terms	feeler w/10 (put* OR sen* OR respon* OR gave OR get* OR pric* OR market)	
General Standalone Terms	follow* w/3 increas*	
General Standalone Terms	follow* w/3 leader"	
General Standalone Terms	game* W/3 theory	
General Standalone Terms	get* w/3 ("price up" OR "Money up" OR "\$ up" OR share)	
General Standalone Terms	goug* w/3 (pric* OR drug OR product OR accus* OR we OR start OR let*)	
General Standalone Terms	greedy	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
General Standalone Terms	hear w/5 (illegal OR irrational OR irresponsible OR rational OR reasonable OR responsible)	
General Standalone Terms	illegal* w/5 (worr* OR afraid OR concern*)	
General Standalone Terms	Market W/3 "like mind"	
General Standalone Terms	Market W/3 "pick* up"	
General Standalone Terms	Market W/3 "too much"	
General Standalone Terms	Market W/3 (chill OR irrational* OR irresponsible OR rational* OR reasonable OR responsible)	
General Standalone Terms	Market W/3 (criminal OR illegal OR schem*)	
General Standalone Terms	Market W/3 agree*	
General Standalone Terms	Market W/3 allocat*	
General Standalone Terms	Market W/3 disrupt*	
General Standalone Terms	Market W/3 disturb*	
General Standalone Terms	Market w/3 divide	
General Standalone Terms	Market w/3 fair	
General Standalone Terms	Market w/3 fix	
General Standalone Terms	Market W/3 game*	
General Standalone Terms	Market w/3 gave	
General Standalone Terms	Market w/3 giv*	
General Standalone Terms	Market w/3 high*	
General Standalone Terms	Market w/3 yield*	
General Standalone Terms	Market W/5 ("let have")	
General Standalone Terms	Market w/5 police	
General Standalone Terms	Market w/5 policing	
General Standalone Terms	market w/5 upset	
General Standalone Terms	Mkt W/10 (criminal OR illegal OR schem*)	
General Standalone Terms	Mkt W/3 (chill OR irrational* OR irresponsible OR rational* OR reasonable OR responsible)	
General Standalone Terms	mkt w/5 (allocat* OR agree OR fair OR fix OR game* OR "let have" OR "like mind")	
General Standalone Terms	mkt w/5 (disrupt* OR disturb* OR police OR policing OR upset)	
General Standalone Terms	mkt w/5 divide	
General Standalone Terms	pass w/3 message	
General Standalone Terms	play* W/3 (fair OR nice)	
General Standalone Terms	pric* W/10 "like mind"	
General Standalone Terms	pric* w/3 (chill OR irrational* OR irresponsible OR rational* OR reasonable OR responsible)	pric* w/3 chill
General Standalone Terms	pric* w/3 (chill OR irrational* OR irresponsible OR rational* OR reasonable OR responsible)	pric* w/3 irrational*
General Standalone Terms	pric* w/3 (chill OR irrational* OR irresponsible OR rational* OR reasonable OR responsible)	pric* w/3 irresponsible

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
General Standalone Terms	pric* w/3 (chill OR irrational* OR irresponsible OR rational* OR reasonable OR responsible)	pric* w/3 responsible
General Standalone Terms	pric* W/3 (criminal OR illegal OR schem*)	
General Standalone Terms	pric* w/3 agree*	
General Standalone Terms	pric* w/3 compet*	
General Standalone Terms	pric* w/3 disrupt*	
General Standalone Terms	pric* w/3 disturb	
General Standalone Terms	pric* w/3 follow*	
General Standalone Terms	pric* w/3 increas*	
General Standalone Terms	pric* w/3 police	
General Standalone Terms	pric* w/3 policing	
General Standalone Terms	pric* w/3 upset	
General Standalone Terms	pric* w/3 war	
General Standalone Terms	pric* w/3 wars	
General Standalone Terms	pric* w/5 fix*	
General Standalone Terms	pric* w/5 lead*	
General Standalone Terms	pric* w/5 rais*	
General Standalone Terms	responsible w/3 (player OR competitor OR market OR markets OR share* OR bid)	
General Standalone Terms	Share w/3 "let go"	
General Standalone Terms	share W/3 "pick* up"	
General Standalone Terms	share w/3 (chill OR irrational* OR irresponsible OR rational* OR reasonable OR responsible)	
General Standalone Terms	share w/3 add*	
General Standalone Terms	share w/3 agree*	
General Standalone Terms	share w/3 challeng*	
General Standalone Terms	share w/3 compet*	
General Standalone Terms	share W/3 disrupt*	
General Standalone Terms	share W/3 disturb*	
General Standalone Terms	share W/3 divid*	
General Standalone Terms	share W/3 fix*	
General Standalone Terms	share w/3 gave	
General Standalone Terms	share w/3 giv*	
General Standalone Terms	share w/3 rais*	
General Standalone Terms	share w/3 trad*	
General Standalone Terms	share W/5 "let have"	
General Standalone Terms	share w/5 "like mind"	
General Standalone Terms	share w/5 "too much"	
General Standalone Terms	share w/5 (criminal OR illegal OR schem*)	
General Standalone Terms	share w/5 allocat*	
General Standalone Terms	share W/5 game*	
General Standalone Terms	share W/5 police	
General Standalone Terms	share W/5 policing	
General Standalone Terms	share w/5 split*	
General Standalone Terms	share w/5 underdevelop*	
General Standalone Terms	share w/5 underrepresent*	
General Standalone Terms	share w/5 upset*	
General Standalone Terms	split* W/3 business	
General Standalone Terms	stand w/3 down	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
General Standalone Terms	steal* w/4 share	
General Standalone Terms	trash* w/3 market	
General Standalone Terms	walk w/3 (away or from)	
Named Plaintiffs	"1199SEIU" OR "@1199seiubenefits.org"	
Named Plaintiffs	"Albertsons.com" OR Albertsons	
Named Plaintiffs	"Cesar Castillo"	
Named Plaintiffs	"Chet Johnson"	
Named Plaintiffs	"Chippewa Pharmacy"	
Named Plaintiffs	"Falconer Pharmacy"	
Named Plaintiffs	"Halliday's"	
Named Plaintiffs	"heb.com" OR HEB OR "H-E-B" OR "HE Butt" OR "H.E. Butt"	
Named Plaintiffs	"Kroger.com" OR Kroger	
Named Plaintiffs	"Marion Diagnostic"	
Named Plaintiffs	"Philadelphia Federation" OR (PFT w/5 Fund) OR "@pftw.org"	
Named Plaintiffs	"Rochester Drug"	
Named Plaintiffs	"Russell's"	
Named Plaintiffs	"Sergeants Benevolent" OR "@sbanypd.nyc"	
Named Plaintiffs	"Southside Pharmacy"	
Named Plaintiffs	"Uniformed Fire Officers" OR "Local 854"	
Named Plaintiffs	"Unite Here" OR UHH OR "@uhh.org"	
Named Plaintiffs	"West Val"	
Named Plaintiffs	("Blue Cross" w/10 Louisiana) OR (BCBS w/10 Louisiana) OR "@bcbsla.com"	
Named Plaintiffs	("Self-Insured Schools" w/5 California) OR SISC OR "@sisc.kern.org"	
Named Plaintiffs	(AFSCME w/5 37) OR "District Council 37" OR "DC 37" OR "@dc37.net"	
Named Plaintiffs	(AFSCME w/5 47) OR "District Council 47" OR "DC 47" OR "@dc47union.org"	
Named Plaintiffs	(City w/3 Providence) OR "@providenceri.gov"	
Named Plaintiffs	(Detective* w/2 Endowment) OR "@nycdetectives.org"	
Named Plaintiffs	(UFCW w/10 Arizona) OR ("United Food" w/10 Arizona)	
Named Plaintiffs	(UFCW w/5 1500) OR "Local 1500" OR "@ufcw1500.org"	
Named Plaintiffs	David w/2 Sherman	
Named Plaintiffs	FWK or Kerr	
Named Plaintiffs	Hennepin w/2 County	
Named Plaintiffs	HPI OR HUM	
Named Plaintiffs	Humana OR "humana.com" OR HPI OR RightSource OR "Right Source" OR HPS	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
Named Plaintiffs	KPH or "Kinney Drugs"	
Named Plaintiffs	Nina w/2 Diamond	
Named Plaintiffs	Optum* OR ORX OR Brivoa OR Catamaran OR Genoa OR Avella OR "@optum.com" OR "@briovax.com" OR "@genoahealthcare.com" OR "@avella.com" OR "catamaranrx.com"	
Named Plaintiffs	Ottis w/2 McCrary	
Named Plaintiffs	Robby w/2 Johnson	
Named Plaintiffs	Unitedhealth* OR (United w/2 Health*) OR UHC OR UHG OR "uhc.com" OR (UH w/50 United)	
Named Plaintiffs	Valerie w/2 Velardi	
People	"O'Dell"	
People	"Rich* Smith"	
People	"Stev* Smith"	
People	"Van Stedum"	
People	"van winkle" w/2 schuyler	
People	(Ball w/2 Will*) OR (Ball w/2 Bill*)	
People	(Barrett OR Baret OR Meehan) w/2 Maureen	
People	(Block w/2 Mike*) OR (Block w/2 Michael)	
People	(Chappel OR Chapel) w/2 Lisa	
People	(Chiwen OR Kristy) w/2 Davis	
People	(Christine w/2 Walton) OR "cvwalton@gmail.com"	
People	(Damico OR Amico) w/2 Joanne	
People	(Foley w/2 Bob*) OR (Foley w/2 Rob*)	
People	(Fournier* OR Fornier*) w/2 (Bruyette OR Tracy)	
People	(Giannone* OR Gianone*) w/2 (Tony OR Anthony)	
People	(GP w/2 Sing*) OR Sachdev OR Gurpar*	
People	(Hoffman w/2 (Rob* or Bob)) AND NOT Novartis	
People	(Holden w/2 Jon*) OR (Holden w/2 John*)	
People	(Kenney w/2 Rene*) OR (Kenny w/2 Rene*)	
People	(Lori w/2 Pierce*) OR (Lori w/2 Peirce) OR (Laur* w/2 Pierce*)	
People	(Marg* OR Margaret) w/2 Ryan	
People	(McBride w/2 Michael) OR (McBride w/2 Mik*)	
People	(Michael OR Mik* OR Ger*) w/2 Burton	
People	(mouro OR sherman OR "mouro-sherman") w/2 teri	



Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	(Nielsen w/2 Dav*) OR (Nelsen w/2 Dav*)	
People	(Oconnor w/2 Karen) OR (Connor w/2 Karen)	
People	(Oneil* w/2 Rob*) OR (Oneil* w/2 Bob*) OR (Neil* w/2 Rob*) OR (Neil* w/2 Bob*)	
People	(Potter w/2 Rob*) OR (Potter w/2 Bob*)	
People	(Raya w/2 Mik*) OR (Raya w/2 Michael)	
People	(Ricket* w/2 Eliz*) OR (Ricket* w/2 Liz*)	
People	(Riker w/2 Will*) OR (Riker w/2 Bill*)	
People	(Rob* or Bob) w/2 Watson	
People	(Rob* OR Bob*) w/2 Miranda	
People	(Sandra OR Sandy) w/2 Bayer	
People	(Schatz w/2 Mart*) OR (Shatz w/2 Mart*)	
People	(Sherman w/2 Ter*) OR Mouro	
People	(Short w/2 Laur*) OR (Short w/2 LOR*)	
People	(Simmons w/2 Bob*) OR (Simmons w/2 Rob*)	
People	(Stillman w/2 Brean*) OR (Stillman w/2 Brian*)	
People	(Thomas or Tom) w/2 Ross	
People	(Tilley OR Cantey) w/3 Brook*	
People	(Trey OR Charles) w/2 Propst	
People	(vogel OR baylor OR "vogel-baylor") w/2 erika	
People	(Wilkinson* w/2 Fred*) OR (Wilkinson w/3 George)	
People	(William* w/2 Erik) OR (William* w/2 Eric)	
People	Abhijit w/2 Patil	
People	Adam w/2 Schultz	
People	adams w/2 john*	
People	Adamson w/2 Pat*	
People	Aigner OR "maigner25@msn.com"	
People	Aldana w/2 Shirley	
People	Alley w/2 Jen*	
People	Alonso w/2 Ivis	
People	Altamuro*	
People	Andrad* w/2 Blend*	
People	Andrus	
People	Apraham*	
People	Arends w/2 Kim*	
People	Alkins w/2 Darren	
People	Augustine w/2 Rita	
People	Aupperlee	
People	austin w/2 jake	
People	Axner*	



Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	Bacerott	
People	Bachmeier	
People	Baeder	
People	Baeringer*	
People	Baker w/2 Joc*	
People	Ballard w/2 Andrea	
People	Barnes w/2 Kristi	
People	Bean w/2 Laura	
People	Bebout	
People	Beck w/2 Jill*	
People	Bedrosian	
People	Beem	
People	Beena	
People	Bell w/2 Jan*	
People	Belli	
People	BenMaimon OR Maimon	
People	Berrios* OR Berios*	
People	Berry w/2 Matt*	
People	berthold w/2 dav*	
People	Bertuc* OR Burtuc*	
People	Biegler w/2 Deb*	
People	Bjork	
People	Blake w/2 Cullen	
People	Blake* w/2 Stu*	
People	blashinsky w/2 mitchell	
People	Blitman	
People	Bogda	
People	Bohling*	
People	Boothe OR "dsboothe1986@gmail.com"	
People	Booyd*	
People	borelli w/2 victor	
People	Bornell	
People	Borowi*	
People	Boulton*	
People	Bowman* w/2 Demian	
People	Boyer w/2 (Andrew OR Andy)	
People	Brad w/2 Leonard	
People	Brandon w/2 Casey	
People	Brassington	
People	Bresch w/2 Heather	
People	Brick w/2 Scott*	
People	Brit* w/3 (Campbell OR Sheets)	
People	Brodner	
People	brown w/2 (jim* OR james)	
People	Brown w/2 Judy	
People	Bueno w/2 Nat*	
People	Burd	
People	Busbee	
People	Calabro	
People	Cam panel*	
People	cangemi w/2 jessica	
People	Canver	
People	Carlson w/2 Cat*	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	Carotenuto	
People	Casilli w/2 Rose*	
People	Castelluzzo w/2 Pat*	
People	Castillo w/2 (Kath*)	
People	Cavanaugh	
People	Cease w/2 Sharon	
People	Chang w/2 Jen*	
People	Christine w/2 (DeLucia* OR Caronna)	
People	Ciccone w/2 Deb*	
People	Cindy w/2 Stevens	
People	Citrino	
People	Civitanes	
People	Cohon*	
People	Colvin* w/2 Jen*	
People	connolly w/2 lauren	
People	Copeland* w/2 Gwen	
People	Corley w/2 (Michael OR Mike)	
People	Couchman	
People	Coughlin* w/2 Terr*	
People	Coward w/2 Ter*	
People	Cowen w/2 Dean	
People	Craig w/2 Boyd	
People	craney w/2 (mike OR michael)	
People	Crawford* w/2 John*	
People	Cunard*	
People	Cur* w/2 Sheila	
People	Daphne w/2 Huang	
People	Darnel*	
People	Darren w/2 Hall*	
People	Dav* w/2 Myer*	
People	Dav* w/2 Seaback	
People	Dean w/3 Jill	
People	Deb* w/2 Chase	
People	Deiriggi	
People	Deluca w/2 Diane	
People	DeMarco* w/2 (Mike OR Michael)	
People	Demiris w/2 Mary	
People	Dengler	
People	Denise w/2 Murphy	
People	Denman	
People	Desai* w/2 Jeremy	
People	DeSalvo*	
People	Dewitt w/2 June*	
People	Diane* w/2 (Maynard* OR Nazar)	
People	dillaway w/2 john	
People	Dingle w/2 Linda	
People	DiPadova w/2 Kim*	
People	DiValerio OR (Tracy w/2 Sullivan)	
People	Dorsey* w/2 (Michael OR Mike)	
People	Dota	
People	Dragone w/2 Kath*	
People	Duda	
People	Dudick*	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	Duncan w/2 Jen*	
People	Dundas	
People	Dunrud OR LeTourneau	
People	Durga	
People	Dutra	
People	Edelman w/2 Kirk	
People	Edelson w/2 Matt*	
People	Ehlinger	
People	Emilio w/2 Stone	
People	Engle	
People	Eric w/2 Muse	
People	Escoto*	
People	Etwaru w/2 Aheliya	
People	Evolga w/2 Alex*	
People	Evolga w/2 Alic*	
People	Faig w/2 Tom*	
People	Falkin* w/2 Marc	
People	Fallis	
People	Fatmi	
People	Fazio w/2 Ros*	
People	Felix w/2 (andrea OR andy)	
People	Field w/2 Rust*	
People	Finio	
People	Fiveash	
People	Fleming* w/2 Keith	
People	Flinn*	
People	Franolic	
People	Galant* w/2 Rach*	
People	Gallagher w/2 Pete*	
People	Galownia	
People	Galvan	
People	Ganesh w/2 Venkat*	
People	Ganesh w/2 Vikr*	
People	Gangadhara OR Gorla*	
People	Gargiulo	
People	Gassert	
People	Gavaris	
People	Gensburger	
People	George w/2 Herman	
People	Giering*	
People	Gillette w/2 Robin	
People	Gittle	
People	Giuli*	
People	Gladys w/2 Romero	
People	Glazer	
People	Goberdhan	
People	Goldstein* w/2 Phil*	
People	Goldy	
People	Goodnature w/2 kara	
People	Gouzo*	
People	Gramug* OR Cassaro	
People	Grauso*	
People	Graverson	
People	Green W/2 Kev*	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	Green w/2 Matt*	
People	Greenblat* w/2 Aaron	
People	Greenblat* w/2 Ron*	
People	Greff w/2 Mar*	
People	Grenfell*	
People	Grisby* OR Grigsby	
People	Grossen*	
People	Grow w/2 (Stuart or Stew or Stu)	
People	Guenther w/2 Deanna	
People	Guerrero w/2 (Elizabeth OR Liz)	
People	Guill* w/3 Rick	
People	Guise w/2 Glor*	
People	Gulyas w/2 Cat*	
People	Guo w/2 Dahai	
People	Gustafson*	
People	Gutwerg*	
People	Guy w/2 Brian	
People	Haaken*	
People	Haddock w/2 (Alli* OR Ally)	
People	Hamilton* w/2 Beth	
People	Hampton* w/2 Jeff*	
People	Hanson w/2 Nic*	
People	Hinman* w/2 Smock	
People	Hoeksema w/2 Paul	
People	Hoffman* w/2 Brian	
People	Hong w/2 Courtn*	
People	Howard w/2 Martin	
People	Hunter w/2 Arlie	
People	Hussey w/2 Scott	
People	Hyman w/2 Shar*	
People	Irwin w/2 Dav*	
People	Iyer OR Swamin* OR Sam bam*	
People	James w/2 Burnett	
People	Jomisko	
People	Jaros* w/2 Deb*	
People	Jasen w/2 Dunn	
People	Jen* w/2 Collins	
People	Jeremy w/2 Tatum	
People	Jermaine w/2 Thomas	
People	Jess* w/2 McLeod	
People	Jim w/2 Estes	
People	Jinping w/2 McCormick*	
People	Joel w/2 Morales	
People	John w/2 Lopez	
People	John w/2 Smith	
People	Johnson w/2 Jeff*	
People	Jones w/2 Steve*	
People	Joseph w/2 Renner	
People	Josh* w/2 Blackwell	
People	Josway*	
People	Kafer	
People	Kait* w/2 Alexander	
People	Kalb w/2 (Michael OR Mik*)	
People	Kandlikar	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	Kat* w/2 (Reiss OR Roberts)	
People	Kathleen w/2 Farley	
People	Kaus	
People	Kavuru* w/2 Vimal	
People	Kazarick w/2 Hilary	
People	Kedrowski w/2 (Jim OR James)	
People	Keefe w/2 Marsha	
People	Keenley	
People	Kern w/2 Dawn	
People	Kerr w/2 Jon*	
People	Kevin w/2 Walker	
People	Khera	
People	Kiernan w/2 Tim*	
People	Kim* w/2 Brooks	
People	Klosek w/2 Aga	
People	knarr w/2 kevin	
People	Knoblauch*	
People	kochan w/2 sharon	
People	koenig w/2 scott	
People	Kolb	
People	Koleto*	
People	Koonce	
People	Koski	
People	Kosoglow w/2 Veronica	
People	Kozlowski* w/2 John	
People	Kriel w/2 Kev*	
People	Krinke	
People	Krishan	
People	Krist* w/2 Simpson	
People	Krist* w/2 Stephen*	
People	Kronovich	
People	Kutinsky*	
People	Kuziora OR Kuzoria	
People	kylochko*	
People	Lamasky	
People	Lam bertz	
People	Lanham w/2 Angela	
People	Lankford	
People	Lapila*	
People	Latorre* w/2 Chris*	
People	Leader w/2 Leslie	
People	Lear w/2 Huang	
People	Levinson w/2 Jared	
People	Lewert w/2 Alicia	
People	Lewis w/2 Sheila	
People	Lexie w/2 (Matthews OR Mills)	
People	Lichter	
People	Likvornik	
People	Link w/2 Dav*	
People	Lombard* w/2 Maria	
People	Lukasiew* OR (Lukasew* w/2 (Dan OR Daniel OR Kat*)) OR Lukasiw*	
People	Lyle w/2 Joan*	
People	Maahs	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	Macrides	
People	Maguire w/2 Jam*	
People	Maiolo w/2 Christine	
People	Malek OR "malekjasen@ymail.com" OR "malekjasen1@yahoo.com" OR "jasenmalek60@yahoo.com"	
People	Malik w/2 Rajiv	
People	Marcus w/2 How*	
People	Mares w/2 Eyel	
People	Markowitz w/2 Paul*	
People	Marro w/2 (Eliz* or Liz* or Beth*)	
People	Martini w/2 Matt*	
People	Mason w/2 (Rob* OR Bob*)	
People	Massa w/2 (Susan or Sue)	
People	Matchet*	
People	Matsuk*	
People	Matt* w/2 "Van Allen"	
People	Mauro w/2 (Anthony OR Tony)	
People	McCann* w/2 (Mick OR Michael OR Brian)	
People	McClard w/2 Jeff*	
People	Mccorkle w/2 Chip	
People	McCormack w/2 Kat*	
People	McCullough w/2 Linda	
People	McElfresh	
People	McGalliard*	
People	McGarty	
People	McInerney w/2 Rose	
People	McMahon* w/2 Paul	
People	McManus* w/2 Justin	
People	Mechler*	
People	Medalle	
People	Mehta w/2 Sat*	
People	Mehta w/2 Sun*	
People	Melissa w/2 (Cromer OR Garnder)	
People	Michael w/2 Allen	
People	Michael w/2 Lupo	
People	Michael w/2 Reiney	
People	Michelle w/2 Miller	
People	Miller w/2 Jeff*	
People	Miller w/2 Renee	
People	Millie w/2 Molina	
People	Minnihan	
People	Miriam w/2 Muller	
People	Mitchel* w/2 Dav*	
People	Moldin	
People	Moore w/2 Tif*	
People	Morcom w/2 Pat*	
People	Morris w/2 Andrea	
People	Morrow w/2 Shar*	
People	Mosberg	
People	Mullery	
People	Mumtaz w/2 Sofia	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	Muzet*	
People	nailor w/2 jill	
People	Nallappan	
People	Nancy w/2 McKenna	
People	Napoleon w/2 Clark*	
People	Narine	
People	Nasse	
People	Neal w/2 (Omara or mara)	
People	Neely	
People	Negron	
People	Nesta	
People	Nicholson w/2 Soph*	
People	Niemi	
People	Nigalaye	
People	Novak w/2 Bret*	
People	Novitski w/2 Chris*	
People	Nugent* w/2 Tim*	
People	Nuzum	
People	Oberman	
People	Olafsson* w/2 Sigurder	
People	Oliver w/2 Taw*	
People	Olson w/2 Chad	
People	Organ w/2 Erin	
People	orlofski w/2 kurt	
People	Ostaficiuk	
People	Ostrander w/2 Susan	
People	Overfield w/2 Courtney	
People	Padilla* w/2 Myrna	
People	Pam w/2 Norris	
People	Pannier	
People	Papa w/2 (Joseph OR Joe OR Joey)	
People	Parham w/2 Kath*	
People	Pat* w/2 Ford	
People	Patel w/2 Bhumika	
People	Patel w/2 Nisha	
People	Paton w/2 Heather	
People	Paul w/2 Cook	
People	pavlak w/2 michael	
People	Pehl* OR Pelke*	
People	Peimer w/2 Nadine	
People	Peluso* OR (schmid w/2 gloria)	
People	Pennington w/2 Karen	
People	Perez w/2 Sandra	
People	Perez w/2 Vielka	
People	Perfet*	
People	Persaud w/2 Kam*	
People	Peters w/2 Jess*	
People	Phil* w/2 Cristiano	
People	Philip w/2 Beers	
People	Picca	
People	Pickford	
People	Player w/2 Erica	
People	Polman	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	Potti	
People	Prediger w/2 cynthia	
People	Price w/2 Shannon	
People	purcell w/2 barbara	
People	Quarrick	
People	Radtke	
People	Raj w/2 Rai	
People	Ramsaran w/2 Elva	
People	Randazzo w/2 Steve	
People	Reading* w/2 Sean*	
People	Reagle w/2 Lisa	
People	Reddy* w/3 (Ram* OR Prasad*)	
People	Reed* w/2 John*	
People	Reed* w/2 Kat*	
People	Reilly w/2 Sean	
People	Reken*	
People	Rice w/2 Karen	
People	Richards w/2 Linda	
People	Rick w/2 Ortiz	
People	Ritchey w/2 Mark	
People	Rod* w/2 Emerson	
People	Rodamer* OR Rodarmer	
People	Rodowicz	
People	rogerson w/2 rick	
People	Ronco	
People	Rotunno w/2 Mary	
People	Sabat* w/2 John	
People	Sabo	
People	Sacheli w/2 (Steven OR Steve OR Stephen)	
People	Saharyan w/2 Mary	
People	Sam* w/2 Goodman	
People	Santangelo* w/2 Pat*	
People	Sather	
People	Saunders* w/2 Brent	
People	Savastano	
People	Schiwbalak OR Shiwbalak	
People	schneider w/2 chris	
People	Schober w/2 Dan*	
People	Schreck OR Shreck	
People	Scott w/2 Char	
People	Scott w/2 Sims	
People	Seiden w/2 (Will* OR Bill)	
People	Shah w/2 Anand	
People	Shah w/2 Jay*	
People	Sharp w/2 Sharen	
People	Sheryl w/2 Cannon	
People	Shook w/2 Kev*	
People	Sica w/2 Kev*	
People	Siebert w/2 Ann*	
People	Silver w/2 Sean	
People	Sisco w/2 Mich*	
People	Skalsk*	
People	Slavsky	



Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	Smith w/2 Kev*	
People	Snyder w/2 Shell*	
People	Soars w/2 Lew*	
People	Soltysik w/2 Anna	
People	Sonig	
People	Spotts	
People	Statler w/2 Doug	
People	Staud	
People	Stefan w/2 Cross	
People	Stefaniak	
People	Steve* w/2 Cohen	
People	Steve* w/2 Goodman	
People	Stol* w/2 Brian	
People	Strelau*	
People	strzeminski w/2 robin	
People	Sundaram	
People	Taffe OR Taaffe	
People	Tam boia	
People	Tekumal	
People	thapar w/2 vik*	
People	Thelen w/2 Renee	
People	Tighe w/2 (Robert OR Gary)	
People	Tim* w/2 Berry*	
People	Tolusso	
People	Tom* w/2 Lewis	
People	Toothman w/2 (Margaret OR Peg*)	
People	Tranter	
People	Tropiano	
People	Truchan*	
People	Tustin* w/2 Bill	
People	Tutland w/2 Shell*	
People	Urbansk*	
People	Vallillo w/2 Carol	
People	Vandekief* w/2 Kris	
People	Vandervort	
People	Vanlies* OR Lieshout*	
People	Varsha w/2 Lala	
People	Veira*	
People	Velez w/2 Luis	
People	Veneziano w/2 Lar*	
People	Venugopal w/2 Perry	
People	Vincent w/2 Post	
People	Vinita w/2 Gupta	
People	Vitolis	
People	Vohra w/2 Umang	
People	Vraniak	
People	Wall w/2 Barb*	
People	Walten	
People	Ward w/2 Pam*	
People	watkins w/2 greg	
People	Watson* w/2 Jeff*	
People	werner w/2 colleen	
People	Wesolowski	
People	Wester w/2 (Andrea or Dre)	

Term Category	Plaintiffs' Proposal	Sandoz's Proposal
People	wetzel w/2 trish	
People	Wiesemann	
People	Wilk* w/2 Grac*	
People	Will* w/2 Huang	
People	William* w/2 Jane*	
People	Wingert* w/2 Martin	
People	Workman w/2 Dav*	
People	Zaklin w/2 Joel	
People	Zenobi w/2 Colleen	
People	Zitnak	

General Standalone Limiters Sandoz Proposed to Search For Within Three Words of Each Defendant Name (i.e., [Manufacturer Name] w/3 each term below)		
“heads up”	“co-opetition”	“call me”
“PI”	dinner	“call my cell”
ask	drink*	“call you”
“touch base”	dumb	“call her”
tell	enter*	“call them”
told	feeler	scotch
inform*	“fill you in”	“send* a message”
reach*	“fill u in”	“send* them a message”
meet*	“fill me in”	“sent a message”
met	“fill him in”	“sent them a message”
event	“fill her in”	“received a call”
restaurant	“fill them in”	speak
concert	“fill us in”	spoke
spa	“will not follow”	vodka
secret	“do not follow”	whiskey
unofficial	“not going to follow”	wine
“text me”	“don’t follow”	“got a call”
“txt me”	“not to follow”	cocktail*
“text you”	“won’t follow”	coffee
“txt you”	gin	complain*
“text him”	golf*	coopetition
“txt him”	goug*	“let have”
“text her”	greedy	
“txt her”	hear*	
“text them”	idiot*	
“txt them”	“in person”	
“cell”	intel*	
“got text*”	“CI”	
“got txt*”	irrational	
“receiv* text”	irresponsible	
“receiv* txt”	lunch	
friend	martini*	
buddy	offer*	
“word on the street”	party	
activist	parties	
beer*	rational	
bourbon	responsible	